



# HGIEL

*We Make People Move...*

Version 2.0


## Supplier Code of Conduct



Document Owner:


**SCM- HEAD**

H.G. INFRA ENGINEERING LIMITED

	<b>H.G. Infra Engineering Limited</b>		
	Document No.	Version No.	Date:
	HGIEL/SCOC/05/22	V 2.0	01.03.2024
	<b>Supplier Code of Conduct</b>		

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## 1. PREAMBLE

H.G. Infra Engineering Limited (hereinafter referred to as HGIEL), is an infrastructure company with more than 20 years of experience in the construction sector. HGIEL has evolved as a leading Indian road infrastructure development company, with project execution capabilities in several states of India.

## 2. PURPOSE

HGIEL fosters responsible behavior in its supply chain, in accordance with the highest standards of ethics, human and labour rights, and environmental sustainability.

The Organization upholds in spirit with the requirements of United Nations Universal Declaration on Human Rights, the fundamental Human Rights Conventions of the International Labour Organization (ILO). The Organization also follows the Business Responsibility and Sustainability Reporting (BRSR) frameworks.

This Supplier Code of Conduct (hereinafter referred to as the 'CoC') will guide all the suppliers to engage in ethical, responsible, and legal business practices in their operations and adhere to ESG standards. HGIEL expects the suppliers to comply with all applicable regulatory requirements and implement policies and procedures, and provide training, as deemed necessary within their organization. This CoC has been developed considering the applicable national laws, regulations, and global standards.


## 3. SCOPE OF THE CODE OF CONDUCT

This Supplier Code of Conduct applies to all the suppliers who are associated with HGIEL including contractors, sub-contractors, vendors, service providers and others who supply goods and services including man-powers to HGIEL.

## 4. ENVIRONMENTAL SUSTAINABILITY

HGIEL expects that suppliers should conduct their business operations in a way that protects the environment. The suppliers should take responsibility for their products and services throughout their lifecycle. All the Suppliers shall:

- Conduct all operations including sourcing, manufacturing, and distribution of products and services with the aim of protecting the environment
- Use natural resources rationally and take appropriate measures toward reducing resource consumption and GHG emissions
- Identify environmental risks and opportunities associated with their activities, products, or services and manage the environmental impacts throughout their lifecycle
- Segregate the waste at the source level and prevent adverse impacts on the environment and biodiversity by facilitating the 3 R Principles (Reduce, Reuse, and Recycling)
- Comply with the applicable environmental regulatory requirements.

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## 5. OCCUPATIONAL HEALTH AND SAFETY

All the Suppliers shall:

- Ensure that their operations do not harm the health and safety of their own employees, contractors, subcontractors, local communities, and the users of its products and services
- Comply with all the applicable laws and regulations with regard to occupational health and safety
- Provide health-related benefits to their employees including contractors and subcontractors
- Identify work-related hazards and risks and take adequate measures to minimize the risks
- Provide training on health and safety measures to all their employees including contractors and subcontractors
- Develop, maintain, and test emergency preparedness and response plan on a periodic basis to keep their employees safe and secure in case of any emergencies and natural disasters
- Ensure to comply with health and safety policy and commitments of H.G. Infra.

## 6. HUMAN RIGHTS

All the suppliers shall support, respect, and protect human and labour rights and make sure their organization is not complicit in any kind of abuses or violations. All the suppliers shall:

### *Nondiscrimination and equal opportunity*


- Comply with all the applicable laws and statutes, to oppose all forms of discrimination in the workplace
- Maintain a workplace free from any form of discrimination and harassment
- Refrain from discrimination in employment practices based on race, color, gender, language, religion, political or other opinion, national or social origin, sexual orientation, age, disability, or any other distinguishing characteristics

### *Working conditions, wages, and benefits*

- Provide healthy and safe working conditions and welfare facilities for the employees including contractors and subcontractors
- Ensure that wages and benefits provided to employees including contractors and subcontractors compliant with applicable national and local laws as well as with contractual agreements
- Ensure that all applicable regulations related to wages, overtime compensation, and other legally mandated benefits are provided to employees including contractors and subcontractors

### *Freedom of Association and Collective Bargaining*

- Respect and recognize the rights of its employees to freely associate, organize and bargain collectively

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#### *Child labour*

- Ensure not to employ workers who not yet reach the legal minimum age for employment as per the applicable laws or are below 18 years of age to work in any occupation or process

#### *Forced labour*

- Ensure to prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery, and any form of human trafficking.

### **7. COMMUNITY**

- All the suppliers should contribute and invest in local employment opportunities, workforce volunteering, and charitable activities across the communities where they conduct their operations.

### **8. ETHICS AND GOVERNANCE**

All the suppliers are required to demonstrate the highest standard of integrity, ethics, and business conduct. All the suppliers shall:

#### *Compliance with applicable rules and regulations*


Ensure to comply with all the applicable rules and regulations within the territory of their operation

#### *Anti-Bribery and Corruption*

- All forms of corruption, bribery, and extortion are prohibited in the Organization. Suppliers must not pay or accept bribes or participate in illegal inducements in business or government relationships, or through the use of intermediaries.
- Ensure to maintain a 'Zero Tolerance' approach to prevent corruption and bribery and comply with applicable laws
- All the suppliers are required to go through the anti-corruption awareness training materials available at <http://thefightagainstcorruption.org/certificate/> and conduct business without engaging in any corrupt practices

#### *Conflict of Interest*

- Ensure to take appropriate measures to avoid and manage conflicts of interest
- Promptly notify all affected parties if an actual or potential conflict of interest arises during the business operations

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#### *Fair competition*

- Ensure to avoid any action that may constitute an illegal practice of unfair competition and ensure compliance with applicable competition laws
- Ensure not to engage in collusive bidding, price discrimination, or other unfair trade practices

#### *Protection of Intellectual Property and H.G. Infra's assets*

- Respect and protect all confidential information and intellectual property of HGIEL
- Ensure not to misuse and share assets of H.G Infra and employ them only for the purpose of conducting the business
- Always safeguard, secure, and protect H.G. Infra's assets and information technology from theft, destruction, misappropriation, wastage, and abuse

#### *Insider Training*

- Comply with applicable anti-money laundering laws and conduct business with ethically responsible partners
- Ensure not to use or share any information in any way to trade or enable others to trade in HGIEL's securities.

#### *Gifts and Hospitality*


- Ensure not to accept a gift and hospitality that might influence, or be perceived to influence, the business decisions of HGIEL.
- Accepting gift cards, loans, cash, or similar payments in any amount from any third party with which HGIEL conducts business is not permitted because it may pose a conflict of interest by implying an obligation on behalf of HGIEL.

#### *Responsible Material Sourcing*

- Ensure goods and materials are not sourced in an illegal way and take appropriate measures for sustainable procurement practices to ensure compliance with the applicable laws and regulations

### **9. NOTICE TO NON- COMPLIANCE**

The suppliers must comply with applicable laws and regulations. Supplier has to declare the compliance to the Supplier Code of Conduct through the declaration as per the Annexure 1. The supplier must promptly report any non-compliance with this Code as per the process laid down in the service agreement. H.G. Infra reserves the right to terminate its agreements, or refuse to do business, with any supplier/subcontractor who fails to comply with this Code. Any breach in compliance with this code of conduct shall lead to the termination of the contract with the respective supplier by H.G. Infra and the blacklisting of the suppliers.

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## 10. VIGIL MECHANISM

All Stakeholders of the Company including vendors and suppliers are eligible to make protected disclosures under Vigil Mechanism/Whistle Blower Policy available at the Company website. The Protected Disclosures may be in relation to matters concerning the Company or its unlisted Subsidiaries or any other Group Company. The disclosure may be made at [whistleblower@hginfra.com](mailto:whistleblower@hginfra.com).

## 11. TRAINING AND COMMUNICATION

HGIEL will ensure that periodic training and standard operating procedures will be given to the suppliers. This CoC shall be communicated to suppliers at the time of onboarding. This CoC will also be shared with all existing employees, directors, contractors, suppliers, and all other relevant stakeholders.

## 12. REVIEW

SCM - Head will be responsible to review this code of conduct on periodic basis. However, HGIEL reserves rights to the amendment of this code.

## 13. REPORTING CONCERNS

Suppliers are encouraged to raise any concerns or grievances arising out of their business relationship with HGIEL. If you have any questions about the provisions detailed in this document, please contact:

### SCM - Head

H.G. Infra Engineering Limited

Corporate Office, III Floor, Sheel Mohar Plaza, A-1, Tilak Marg, C-Scheme, Jaipur, Rajasthan - 302001


Board: +91-141-4106 040 / 41

Fax: +91-141 - 4106 044

Mail: [scm@hginfra.com](mailto:scm@hginfra.com)

\* \* \* \* \*

Approved by the Board of Directors  
(Amended w.e.f. March 01, 2024)

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## Annexure 1

(To be printed on Supplier's letterhead)

### Declaration of Compliance to H.G. Infra Engineering Limited Code of Conduct of Suppliers

To,  
The SCM - Head

Address

Sub: Declaration of Compliance to H.G. Infra Engineering Limited Code of Conduct

1. I / We hereby confirm that I / We have read and understood the Code of Conduct for Suppliers and undertake to comply with the same and all applicable laws and regulations.
2. I / We undertake to comply with the Code of Conduct in letter and in spirit.
3. I / We agree that these clauses / provisions or amendment if any, form an integrated part of any or all HGIEL's purchase order or work order or agreement/contract.
4. I / We confirm and uphold similar values as enshrined in this CoC and accordingly conduct my / our business operations.
5. I / We shall promptly notify an actual or potential breach and provide all information in this regard as per the provisions of CoC.
6. I / We shall promptly take all remedial actions as required to comply with CoC.
7. I / We state that none of our activities are/have been conducted in violation of the Code of Conduct except the following:


Name of Company:

Name and Designation of Authorized Signatory

Place: Date:

Signature & Seal



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## Reference

1. The Ten Principles of the UN Global Compact
2. The Universal Declaration of Human Rights
3. The Minimum Wages Act, of 1948
4. The Employees' State Insurance Act of 1948
5. The Maternity Benefit Act of 1961
6. The Workmen's Compensation Act of 1923
7. The Child Labour (Prohibition and Regulation) Act of 1986
8. The Contract Labour (Regulation and Abolition) Act of 1970
9. The Bonded Labour System (Abolition) Act of 1976

## Abbreviations

CoC	Code of Conduct
GHG	Greenhouse Gas
ILO	International Labour Organization
UN	United Nations
SCM	Supply Chain Management